

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Reginald Lovelace

Case: 2:24-mj-30511
Case No. Assigned To : Unassigned
Assign. Date : 11/27/2024
Description: COMP USA V. SEALED
MATTER (KB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 29, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922 (g)(1)	Felon in Posession of a Firearm

This criminal complaint is based on these facts:
see attached affidavit.

Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 26, 2024

City and state: Detroit, MI


Complainant's signature

SA Jimmie Pharr, ATF
Printed name and title


Judge's signature

Hon. Anthony P. Patti, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Jimmie Pharr, Special Agent for the Bureau of Alcohol, Tobacco, Firearms and Explosives, being duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives since January 17, 2016. I am currently assigned to the Detroit Field Division. I completed twenty-six weeks of training, which was comprised of the Criminal Investigator Training Program and the ATF Special Agent Basic Training program at the Federal Law Enforcement Training Center in Glynco, Georgia. I received extensive training on firearms identification, common scenarios involving firearms and narcotics trafficking, and identification and effects of controlled substances. Additionally, I received training on undercover investigations related to firearms and narcotics trafficking, which included investigative techniques and common subject behavior. I was also employed as a Detroit Police Officer for the City of Detroit for approximately three years, 2013-2016. During my employment with the Detroit Police Department, I conducted and participated in numerous

criminal investigations focused on individuals who illegally possessed firearms and narcotics.

2. This affidavit is in support of criminal complaint and application for an arrest warrant for Reginald LOVELACE for the crime of Title 18, U.S.C. § 922(g)(1), felon in possession of a firearm.

3. The facts in this affidavit come from my personal observations, training, experience, and information obtained from ATF Special Agents, Task Force Officers, Police Officers, Detectives and witnesses. This affidavit is intended to show that there is sufficient probable cause for the requested warrant and does not set forth all information known to law enforcement regarding this investigation.

II. SUMMARY OF THE INVESTIGATION

4. On October 29, 2024, at approximately 05:54 a.m., Detroit Police Officers were dispatched to XXXX South Beatrice St., Detroit, Michigan, to investigate a felonious assault incident. Prior to arriving at the residence, officers made contact with the victim and a witness near the intersection of S. Beatrice St. and Omaha St. The victim explained that at approximately 5:00 a.m. she and LOVELACE got into an altercation regarding the victim arriving home late. The victim

stated LOVELACE struck her in the face with a closed fist. Per the victim, while lying on the floor LOVELACE “cocked” a firearm next to the victim and threaten to shoot the victim if she left. The victim described the firearm as a “small black gun”. The victim eventually was able to leave the location and contact the police.

5. While speaking with the victim, officers saw LOVELACE at the rear of XXXX S. Beatrice St. Officers pursued LOVELACE through the alley, but lost sight of him. Additional officers responded to the area to assist with canvassing for LOVELACE. Officers found LOVELACE stuck on a gate by his clothing, hanging off the ground, near another location on S. Beatrice St., less than 500 feet from where they had originally seen him. Two phones and a firearm were lying on the ground below LOVELACE. LOVELACE told officers that the phones belonged to him but denied ownership of the firearm. The firearm recovered was consistent with the description given by the victim of a “small black gun”.

6. Officers recovered the two phones and the firearm, a Jennings pistol, model: Bryco 58, caliber: 9mm, bearing serial number 974129. Officers helped LOVELACE get off the gate and arrested him

for felonious assault. LOVELACE was transported to the Detroit Detention Center without incident and the property was place in evidence at the Detroit Police Department. The firearm was queried in LEIN and found to be unregistered.

7. As an ATF Interstate Nexus Agent, I know that Jennings firearms are not manufactured in the State of Michigan. Therefore, it is my preliminary opinion that the above stated firearm traveled in interstate or foreign commerce.

8. LOVELACE has the following criminal history:

- a. 1997, Controlled Substance - Delivery/Manufacturer, 3rd Circuit Court, Wayne County.
- b. 1999, Controlled Substance - Delivery/Manufacturer, 3rd Circuit Court, Wayne County.
- c. 2011, Stolen Property- Receiving and Concealing-Motor Vehicle and Weapons Felony Firearm, 3rd Circuit Court, Wayne County.
- d. 2018, Forgery-License Document and Plates, 3rd Circuit Court, Wayne County.

e. 2019, Carrying a Concealed Weapon, 3rd Circuit Court, Wayne County.

9. LOVELACE is a convicted felon and was convicted of violations that were punishable of more than one year in prison. Additionally, LOVELACE was under Michigan Department of Corrections (MDOC) supervision for his most recent conviction. I reviewed records from MDOC, including form CSJ-290 signed by LOVELACE on January 18, 2022, which informed him in writing that he is prohibited from possessing firearms or ammunition.

III. CONCLUSION

10. Probable cause exists that Reginald LOVELACE, a convicted felon, was in possession of a firearm, manufactured outside the state of Michigan, knowing that he was a felon and prohibited from possessing any firearms or ammunition, in violation of Title 18, U.S.C. § 922(g)(1).



Jimmie Pharr, Special Agent,
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Anthony P. Patti
United States Magistrate Judge

Dated: November 26, 2024